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Attorneys for Defendants Nestor A. Sandoval, Paragon
Leasing, L.P., and Stevens Transport, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ARNULFO B. BALDERAMA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	No. 2:18-cv-17649
NESTOR A. SANDOVAL, PARAGON	:	
LEASING, INC., STEVENS TRANSPORT,	:	
INC., and JOHN DOES 1-5 (fictitious	:	
names),	:	
	:	
Defendants.	:	
	:	

NOTICE OF REMOVAL

Defendants Nestor A. Sandoval, whose address is 2403 Spring Dusk Lane, Spring, Texas 77373, Paragon Leasing, L.P., the address of which is 9757 Military Parkway, Dallas, Texas 75227, and Stevens Transport, Inc., the address of which is 9757 Military Parkway, Dallas, Texas 75227, remove this action, which has been brought by plaintiff Arnulfo B. Balderama, whose address is 73 William Street, Kearny, New Jersey 07032, from the Superior Court of the State of New Jersey, Hudson County to the United States District Court for the District of New Jersey.

1. The plaintiff commenced this action against Nestor A. Sandoval, Paragon Leasing, L.P., and Stevens Transport, Inc. in the Superior Court, Passaic County. A

copy of the complaint is attached as **Exhibit A**; a copy of the answer is attached as **Exhibit B**.
The venue later was changed to the Superior Court, Hudson County.

2. The plaintiff is a citizen of the State of New Jersey and was a citizen of the State of New Jersey when this action was started in state court.

a. Arnulfo B. Balderama is (and was) a citizen of the State of New Jersey.

3. The defendants are citizens of states other than the State of New Jersey and were citizens of states other than the State of New Jersey when this action was started in state court.

a. Nestor A. Sandoval is (and was) a citizen of the State of Texas.

b. Paragon Leasing, L.P. is (and was) a limited partnership, the members of which are Stevens Transport, Inc. and Hanover International, LLC.

i. Stevens Transport, Inc. is (and was) incorporated in the State of Texas with its principal place of business in the State of Texas.

ii. Hanover International, LLC is a limited liability company, the sole member of which is Stevens Transport, Inc.

A. Stevens Transport, Inc. is (and was) incorporated in the State of Texas with its principal place of business in the State of Texas.

c. Stevens Transport, Inc. is (and was) incorporated in the State of Texas with its principal place of business in the State of Texas.

d. John Does 1–5 are fictitious names the citizenships of which are disregarded. *See* 28 U.S.C. § 1441(b)(1).

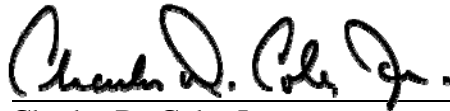
4. The plaintiff demands damages in excess of \$75,000 exclusive of interest and costs, which demand was received on December 26, 2018.

5. This court has subject-matter jurisdiction over this action under section 1332(a)(1) of the Judicial Code, 28 U.S.C. § 1332(a)(1), because this action—both now and when it was started in state court—is between citizens of different states and the amount in controversy exceeds the sum or value of \$75,000 exclusive of interest and costs.

6. The defendants may, under section 1441(a) of the Judicial Code, 28 U.S.C. § 1441(a), remove this action to this court because this is a civil action of which the district courts of the United States have original jurisdiction that is brought in state court.

7. All defendants join in the removal of this action to this court.

Dated: New York, New York
December 27, 2018

A handwritten signature in black ink, reading "Charles D. Cole, Jr.", is written over a horizontal line.

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